

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in The U.S.  
DISTRICT COURT at Seattle, Washington.

February 17, 2005  
By Bruce Rifkin, Clerk  
K. Quent Zochary, Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

EVANGELOS DIMITRIOS SOUKAS,  
a/k/a EVAN SOUKAS,  
a/k/a JOSHUA PATZ,

Defendant.

CASE NO.

CR05 0066  
INDICTMENT  
JLR

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

05-CR-00066-INDI

The Grand Jury charges that:

COUNT 1  
(Conspiracy to Commit Wire Fraud and Mail Fraud)

A. The Offense

1. Beginning at a date uncertain, but sometime in or about February 1999, and continuing through in or about May 2001, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN SOUKAS, a/k/a JOSHUA PATZ, and others known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate and agree to commit offenses against the United States, to wit:

a. To knowingly use the mail and cause the use of the mails in furtherance of a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, and to aid and abet, cause and procure same, knowing full well that the pretenses, representations and

//

INDICTMENT/SOUKAS - 1

UNITED STATES ATTORNEY  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
(206) 553-7970

1 promises were false when made, in violation of Title 18, United States Code, Sections  
2 1341 and 2 (Mail Fraud); and

3           b. To knowingly transmit and cause to transmit by wire,  
4 communications in interstate and foreign commerce in furtherance of the same scheme  
5 and artifice to defraud and for obtaining money and property by means of false and  
6 fraudulent pretenses, representations and promises, and to aid and abet, cause and procure  
7 same, knowing full well that the pretenses, representations and promises were false when  
8 made, in violation of Title 18, United States Code, Sections 1343 and 2 (Wire Fraud).

9 **B. The Object of the Conspiracy**

10           2. The object of the conspiracy was for EVANGELOS DIMITRIOS SOUKAS  
11 and other coconspirators to post false and fraudulent advertisements of merchandise for  
12 sale on various internet auction web sites, knowing that they neither possessed nor  
13 intended to deliver the advertised merchandise; to cause victims to pay for fraudulently  
14 advertised merchandise by electronically wiring funds into accounts held by the  
15 coconspirators, or mailing checks to the coconspirators, who then would deposit the  
16 checks into accounts controlled by the coconspirators and cause those funds to be  
17 electronically wired to SOUKAS's overseas bank accounts; and to fail to deliver the  
18 advertised merchandise to their victims and refuse to refund the payments to the victims.

19 **C. Essence of the Conspiracy**

20           3. The essence of the conspiracy was that EVANGELOS DIMITRIOS  
21 SOUKAS would post on internet auction web sites, including eBay.com, Yahoo.com,  
22 Amazon.com, DellAuctions.com, and ZDNet.com, false and fraudulent advertisements  
23 for the sale of merchandise, typically computers and computer-related equipment, that  
24 SOUKAS did not possess or intend to deliver. SOUKAS would use various user  
25 names/e-mail addresses to post the false and fraudulent advertisements on internet auction  
26 web sites, including athensboy1978@yahoo.com, aapilot1945@aol.com,  
27 dallaspilot1945@aol.com, evangelossoukas@hotmail.com, fratboy246@aol.com,  
28 gogoboy21@aol.com, joshkpatz@hotmail.com, monroboy22@aol.com,

1 seattle1987@aol.com, kissboy99@aol.com, dieselboy1978@yahoo.com,  
2 edsoukas22@aol.com, angelosaoukas@aol.com and computerstore234@aol.com.

3 4. Once EVANGELOS DIMITRIOS SOUKAS established accounts with  
4 internet auction web sites under one or more user names/e-mail addresses, he would  
5 occasionally sell and deliver inexpensive items to bidders. By so doing, SOUKAS would  
6 obtain positive reviews that would be posted on the auction site for other potential buyers  
7 to read. This would increase the likelihood that other potential victims would trust him  
8 and purchase merchandise from him. Using different user names/e-mail addresses,  
9 SOUKAS would also pretend to be a buyer and post positive reviews of himself on the  
10 auction site for other potential buyers to read.

11 5. In order to obtain payment for the advertised merchandise, EVANGELOS  
12 DIMITRIOS SOUKAS would require purchasers to send a personal check, cashier's  
13 check or money order through the mail, to wire money to accounts specified by  
14 SOUKAS, or to use an on-line payment system known as Paypal to wire money into  
15 accounts specified by SOUKAS. After victims would send payments in response to the  
16 false and fraudulent advertisements, coconspirators working with SOUKAS would  
17 receive and deposit these checks and negotiable instruments into their own or SOUKAS's  
18 bank accounts. Coconspirators would sometimes sign SOUKAS's signature to deposit or  
19 negotiate these items. Coconspirators would then electronically wire such funds to bank  
20 accounts belonging to SOUKAS, including a Eurobank account, account number \*\*\*-  
21 \*\*\*-\*\*\*\*\*0145.

22 6. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
23 SOUKAS and other members of the conspiracy would intentionally fail to deliver the  
24 fraudulently advertised merchandise. In one instance, the coconspirators attempted to  
25 send a box containing only worthless rocks and styrofoam to a victim. Coconspirators  
26 working with SOUKAS would also refuse to refund victims' money.

27 7. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
28 SOUKAS would provide his victims with false shipping information for merchandise and

1 would falsely claim in e-mail correspondence with victims that SOUKAS had shipped the  
2 merchandise for which his victims had paid. By so doing, SOUKAS would persuade  
3 many of his victims to continue to believe that their transactions with SOUKAS were  
4 legitimate, which would thereby provide SOUKAS with enough time to transfer money  
5 paid by victims into bank accounts controlled by SOUKAS or his coconspirators.

6 8. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
7 SOUKAS would provide to victims telephone numbers for coconspirators working with  
8 SOUKAS. When victims called coconspirators to inquire about the delivery of the  
9 merchandise, the coconspirators would state that SOUKAS was currently not present or  
10 was at his girlfriend's residence. In truth and fact, as coconspirators well knew,  
11 SOUKAS was in Greece, where he had fled to avoid arrest, and he had no intention of  
12 delivering merchandise to his victims.

13 9. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
14 SOUKAS and other coconspirators thereby obtained, or attempted to obtain, through  
15 fraudulent internet auction sales, approximately \$293,727.78 to use for their own benefit  
16 and purposes.

17 **D. Manner and Means of the Conspiracy**

18 10. It was part of the conspiracy to engage in fraudulent communications and  
19 fraudulent transactions in order to obtain payment for nonexistent articles. In some  
20 instances, EVANGELOS DIMITRIOS SOUKAS and his coconspirators succeeded and  
21 caused actual losses to the victims of the scheme. In other instances, although SOUKAS  
22 and his coconspirators attempted and intended to obtain money through their fraudulent  
23 representations, no actual loss resulted because bidders suspected fraud or because there  
24 were no bidders. Below are representative examples of these fraudulent transactions and  
25 the resulting loss or intended loss therefrom.

26  
27  
28 //

1                   **1.     Representative Examples of Fraudulent Transactions**

2                   **a.     Victim KK**

3           11.     On or about January 25, 2000, EVANGELOS DIMITRIOS SOUKAS  
4     accepted a winning bid from KK in the amount of \$1,250.00 in response to a false and  
5     fraudulent advertisement for a Sony F350 laptop computer that SOUKAS had posted, or  
6     caused to be posted, on eBay.com.

7           12.     Pursuant to the instructions of EVANGELOS DIMITRIOS SOUKAS, on or  
8     about January 25, 2000, SK sent a check to a coconspirator at 18463 Blueberry Lane,  
9     Apartment J-301, Monroe, Washington, to purchase the Sony F350 laptop computer that  
10    SOUKAS had fraudulently advertised on eBay.com. The check was drawn on the joint  
11    checking account of KK and SK and was payable to SOUKAS in the amount of  
12    \$1,270.00 (winning bid of \$1,250.00 plus shipping).

13          13.     On or about February 1, 2000, a coconspirator received a check from SK  
14    made payable to EVANGELOS SOUKAS, signed SOUKAS's name on the check,  
15    endorsed the check to herself, and deposited the check into her Heritage Bank savings  
16    account, account number \*\*\*\*\*3446.

17                   **b.     Victim BV**

18          14.     On or about September 22, 2000, EVANGELOS DIMITRIOS SOUKAS  
19    accepted a winning bid from BV in the amount of \$1,035.00 in response to a false and  
20    fraudulent advertisement for a Canon Optura camcorder that SOUKAS had posted, or  
21    caused to be posted, on eBay.com.

22          15.     Pursuant to the instructions of EVANGELOS DIMITRIOS SOUKAS, on or  
23    about September 22, 2000, BV paid \$1,035.00 for the Canon Optura camcorder that  
24    SOUKAS had fraudulently advertised on eBay.com by transferring the funds into  
25    SOUKAS's Paypal account, account number \*\*\*\*\*8806, which SOUKAS  
26    had opened using the false name of "Joshua Pats."

27          16.     On or about September 26, 2000, EVANGELOS DIMITRIOS SOUKAS  
28    transferred \$1,025.00 from SOUKAS's Paypal account, account number

1 \*\*\*\*\*8806, into SOUKAS's Wingspan Bank account, account number  
2 \*\*\*\*\*5494, which SOUKAS had opened using the false name of "Josh K. Patz."

3 17. On or about September 28, 2000, EVANGELOS DIMITRIOS SOUKAS  
4 wired \$2,500.00 from SOUKAS's Wingspan Bank account, account number  
5 \*\*\*\*\*5494, into a coconspirator's account at U.S. Bank, account number \*-\*\*\*-  
6 \*\*\*\*\*5479.

7 c. Victim LG

8 18. On or about September 24, 2000, EVANGELOS DIMITRIOS SOUKAS  
9 accepted a bid from LG in response to a false and fraudulent advertisement for a Sony  
10 XG-19 laptop computer that SOUKAS had posted, or caused to be posted, on eBay.com.

11 19. Pursuant to the instructions of EVANGELOS DIMITRIOS SOUKAS, on or  
12 about September 25, 2000, LG paid for a Sony XG-19 laptop computer that SOUKAS  
13 had fraudulently advertised on eBay.com by transferring \$2,401.00 into SOUKAS's  
14 Paypal account, account number \*\*\*\*\*8806, which SOUKAS had opened  
15 using the false name of "Joshua Pats."

16 20. On or about September 28, 2000, EVANGELOS DIMITRIOS SOUKAS  
17 transferred \$2,200.00 from SOUKAS's Paypal account, account number  
18 \*\*\*\*\*8806, into SOUKAS's Wingspan Bank account, account number  
19 \*\*\*\*\*5494, which SOUKAS had opened using the false name of "Josh K. Patz."

20 21. On or about October 2, 2000, EVANGELOS DIMITRIOS SOUKAS  
21 transferred \$2,500.00 from SOUKAS's Wingspan Bank account, account number  
22 \*\*\*\*\*5494, into a coconspirator's account at U.S. Bank, account number \*-\*\*\*-  
23 \*\*\*\* 5479.

24 22. On or about October 26, 2000, a coconspirator caused a wire transfer of  
25 \$4,100.00 from her U.S. Bank checking account, account number \*-\*\*\*-\*\*\*\*5479, into  
26 the Eurobank account of EVANGELOS DIMITRIOS SOUKAS, account \*\*\*-\*\*\*-  
27 \*\*\*\*\*0145. These funds had previously been obtained from LG for the purchase of a  
28 Sony XG-19 laptop computer from SOUKAS and from BV for the purchase of a Canon

1 Optura camcorder from SOUKAS, each of which SOUKAS had fraudulently advertised  
2 on internet auction web sites.

3 **d. Victim SG**

4 23. On or about April 3, 2001, EVANGELOS DIMITRIOS SOUKAS accepted  
5 a winning bid in the amount of \$2,132.00 from SG in response to a false and fraudulent  
6 advertisement for a Dell Inspiron laptop computer that SOUKAS had posted, or caused  
7 to be posted, on Dellauction.com.

8 24. Pursuant to the instructions of EVANGELOS DIMITRIOS SOUKAS, on or  
9 about April 4, 2001, SG mailed a check made payable to EVANGELOS SOUKAS in the  
10 amount of \$2,132.00 to a coconspirator at 18463 Blueberry Lane, Apartment J-301,  
11 Monroe, Washington, to purchase the Dell Inspiron laptop computer that SOUKAS had  
12 fraudulently advertised on Dellauction.com.

13 25. On or about April 7, 2001, a coconspirator signed the name EVANGELOS  
14 SOUKAS on a check mailed by SG to her at 18463 Blueberry Lane, Apartment J-301,  
15 Monroe, Washington, and deposited the check into her U.S. Bank checking account,  
16 account number \*-\*\*\*-\*\*\*\*5479.

17 26. On or about April 16, 2001, SG called (425) 210-0330 and spoke to a  
18 coconspirator, who identified herself as the sister of EVANGELOS SOUKAS. SG asked  
19 to speak with EVANGELOS. The coconspirator said that EVANGELOS was at his  
20 girlfriend's house and that SG should call back and leave a voicemail message for  
21 EVANGELOS, when, in truth and fact, as the coconspirator well know, SOUKAS was in  
22 Athens, Greece.

23 **e. Victim RW**

24 27. On or about May 15, 2001, EVANGELOS DIMITRIOS SOUKAS accepted  
25 an offer from RW in the amount of \$2,500.00 in response to a false and fraudulent  
26 advertisement for a Powerbook G4 laptop computer that SOUKAS had posted, or caused  
27 to be posted, on eBay.com.  
28

28. On or about May 17, 2001, a coconspirator accepted a wire transfer of \$2,516.00 into her U.S. Bank checking account, account number \*-\*\*\*-\*\*\*\*5479, from RW for the purchase of a Powerbook G4 laptop computer that SOUKAS had fraudulently advertised on eBay.com.

29. On or about May 21, 2001, a coconspirator caused a wire transfer of \$2,000.00 from her U.S. Bank checking account, account number \*-\*\*\*-\*\*\*\*5479, into the Eurobank account of EVANGELOS DIMITRIOS SOUKAS, account \*\*\*-\*\*\*-\*\*\*\*\*0145.

30. On or about May 22, 2001, a coconspirator shipped a box to RW, purportedly containing a Powerbook G4 laptop computer with a declared value of \$2,500.00, but which contained only worthless rocks and styrofoam.

**2. Actual Losses Caused by Fraudulent Internet Auctions**

31. On or about the following listed dates, EVANGELOS DIMITRIOS SOUKAS, using the user name/e-mail addresses set forth below, and in response to fraudulent advertisements for merchandise that SOUKAS had posted or caused to be posted on the following internet auction web sites, accepted the bids set forth below from the following victims (designated by their initials), who provided payment to SOUKAS in the following approximate amounts:

<u>Approximate Date</u>	<u>SOUKAS's User Name/ E-Mail</u>	<u>Auctioneer</u>	<u>Actual Loss/ Price</u>	<u>Victim</u>
2/12/1999	versgreek	eBay	\$1,925.00	GS
2/24/1999	versgreek	eBay	\$700.00	TM
2/24/1999	versgreek	eBay	\$50.00	JF
5/17/1999	gogoboy21@aol.com	eBay	\$1,705.00	TG
5/24/1999	gogoboy21@aol.com	eBay	\$10.50	SB
5/24/1999	gogoboy21@aol.com	eBay	\$330.00	MD
6/3/1999	fratboy246@aol.com	eBay	\$62.00	MR
6/3/1999	fratboy246@aol.com	eBay	\$761.00	DS
6/3/1999	fratboy246@aol.com	eBay	\$21.01	CL
7/9/1999	soukas	eBay	\$36.00	AG
8/16/1999	soukas	eBay	\$510.00	LG
8/29/1999	soukas	eBay	\$800.00	RW
8/29/1999	soukas	eBay	\$182.50	ER



1	8/31/1999	soukas	eBay	\$1,826.00	RK
	1/25/2000	kissboy99	eBay	\$1,475.00	CC
2	1/25/2000	kissboy99	eBay	\$1,250.00	KK
3	1/26/2000	kissboy99	eBay	\$1,876.00	MK
	1/26/2000	kissboy99	eBay	\$1,802.00	JH
4	3/14/2000	gogoboy21@aol.com	Yahoo	\$2,510.00	BC
5	3/29/2000	gogoboy21@aol.com	ZDNet	\$2,200.00	JF
	4/4/2000	aapilot1045	eBay	\$2,550.00	JK
6	4/13/2000	aapilot1045	eBay	\$2,225.00	JK
7	4/13/2000	aapilot1045	eBay	\$2,550.00	JE
	4/13/2000	aapilot1045	eBay	\$2,550.00	CB
8	4/13/2000	aapilot1045	eBay	\$2,500.50	DR
9	4/16/2000	gogoboy21@aol.com	Amazon	\$2,700.00	VS
	4/16/2000	gogoboy21@aol.com	Amazon	\$2,700.00	MB
10	4/16/2000	gogoboy21@aol.com	Amazon	\$2,700.00	LL
11	4/16/2000	gogoboy21@aol.com	Amazon	\$2,700.00	PK
	5/6/2000	aapilot1045	eBay	\$2,850.00	DM
12	5/6/2000	aapilot1045	eBay	\$3,051.00	SP
	5/6/2000	aapilot1045	eBay	\$3,100.00	JM
13	5/11/2000	burke9999	eBay	\$3,035.00	DM
14	6/12/2000	evangelossoukas@hotmail	Yahoo	\$2,500.00	BG
15	7/14/2000	joshkpatz@hotmail.com	Amazon	\$2,850.00	RS
	7/18/2000	joshkpatz@hotmail.com	Amazon	\$2,500.00	SA
16	7/20/2000	joshkpatz@hotmail.com	Amazon	\$2,025.00	unknown
17	7/23/2000	joshkpatz@hotmail.com	Amazon	\$610.00	R
	7/23/2000	joshkpatz@hotmail.com	Amazon	\$600.00	K
18	8/2/2000	joshkpatz@hotmail.com	eBay	\$2,900.00	SF
19	8/2/2000	joshkpatz@hotmail.com	eBay	\$2,850.00	KS
	8/2/2000	joshkpatz@hotmail.com	eBay	\$2,400.00	ML
20	8/2/2000	joshkpatz@hotmail.com	eBay	\$565.00	HP
21	8/2/2000	joshkpatz@hotmail.com	eBay	\$510.00	BW
	8/2/2000	joshkpatz@hotmail.com	eBay	\$500.00	BW
22	8/2/2000	joshkpatz@hotmail.com	eBay	\$415.00	BW
	8/2/2000	joshkpatz@hotmail.com	Amazon	\$810.00	R
23	8/2/2000	joshkpatz@hotmail.com	Amazon	\$1,250.00	AT
24	8/8/2000	joshkpatz@hotmail.com	eBay	\$2,800.00	JS
	8/8/2000	joshkpatz@hotmail.com	eBay	\$2,850.00	JS
25	8/8/2000	joshkpatz@hotmail.com	eBay	\$2,749.00	JS
26	8/8/2000	joshkpatz@hotmail.com	eBay	\$2,800.00	JS
	8/8/2000	joshkpatz@hotmail.com	eBay	\$2,875.00	MV
27	8/8/2000	joshkpatz@hotmail.com	eBay	\$530.00	MD
28	8/8/2000	joshkpatz@hotmail.com	eBay	\$511.00	TW
	8/8/2000	joshkpatz@hotmail.com	eBay	\$531.00	MB

1	8/9/2000	joshkpatz@hotmail.com	eBay	\$2,625.00	RM
2	8/12/2000	joshkpatz@hotmail.com	eBay	\$475.00	AM
3	8/14/2000	joshkpatz@hotmail.com	eBay	\$480.00	PV
4	9/15/2000	evangelossoukas@hotmail	eBay	\$500.00	MB
5	9/15/2000	evangelossoukas@hotmail	eBay	\$2,020.00	PR
6	9/20/2000	evangelossoukas@hotmail	eBay	\$500.00	MB
7	9/20/2000	evangelossoukas@hotmail	eBay	\$500.00	MB
8	9/20/2000	evangelossoukas@hotmail	eBay	\$500.00	MB
9	9/20/2000	evangelossoukas@hotmail	eBay	\$200.00	MB
10	9/22/2000	athensboy1978@yahoo.com	eBay	\$2,425.00	RV
11	9/22/2000	athensboy1978@yahoo.com	eBay	\$2,325.00	GF
12	9/22/2000	athensboy1978@yahoo.com	eBay	\$2,500.00	RV
13	9/22/2000	athensboy1978@yahoo.com	eBay	\$1,050.00	BV
14	9/22/2000	athensboy1978@yahoo.com	eBay	\$1,000.00	TA
15	9/22/2000	athensboy1978@yahoo.com	eBay	\$810.00	AB
16	9/22/2000	athensboy1978@yahoo.com	eBay	\$610.00	WG
17	9/22/2000	athensboy1978@yahoo.com	eBay	\$610.00	MC
18	9/22/2000	athensboy1978@yahoo.com	eBay	\$510.00	CJ
19	9/22/2000	athensboy1978@yahoo.com	eBay	\$50.00	JC
20	9/22/2000	athensboy1978@yahoo.com	eBay	\$920.00	GM
21	9/22/2000	athensboy1978@yahoo.com	eBay	\$450.00	JR
22	9/22/2000	athensboy1978@yahoo.com	eBay	\$500.00	JC
23	9/23/2000	athensboy1978@yahoo.com	Private Sale	\$900.00	SD
24	9/24/2000	athensboy1978@yahoo.com	eBay	\$2,401.00	YK
25	9/24/2000	athensboy1978@yahoo.com	eBay	\$2,401.00	LG
26	9/24/2000	athensboy1978@yahoo.com	eBay	\$2,401.00	YK
27	9/24/2000	athensboy1978@yahoo.com	eBay	\$1,802.00	AF
28	9/28/2000	athensboy1978@yahoo.com	eBay	\$474.00	GP
	10/4/2000	newyorkpilot1945@aol.com	eBay	\$560.00	KJ
	10/5/2000	dallaspilot1945@aol.com	eBay	\$530.00	GM
	10/5/2000	dallaspilot1945@aol.com	eBay	\$510.00	KK
	10/5/2000	dallaspilot1945@aol.com	eBay	\$520.01	JQ
	10/5/2000	dallaspilot1945@aol.com	eBay	\$510.00	JK
	10/16/2000	Monroeboy22@aol.com	eBay	\$2,151.00	CF
	10/16/2000	Monroeboy22@aol.com	eBay	\$2,200.00	JC
	10/16/2000	Monroeboy22@aol.com	eBay	\$2,151.00	SM
	10/16/2000	Monroeboy22@aol.com	eBay	\$2,175.00	MT
	10/18/2000	Monroeboy22@aol.com	eBay	\$2,211.00	MZ
	10/18/2000	Monroeboy22@aol.com	eBay	\$2,035.00	CD
	10/18/2000	Monroeboy22@aol.com	eBay	\$2,028.00	CD
	10/18/2000	Monroeboy22@aol.com	eBay	\$2,075.00	SM
	10/18/2000	Monroeboy22@aol.com	eBay	\$2,113.00	SM
	10/18/2000	Monroeboy22@aol.com	eBay	\$2,090.00	JP

1	10/18/2000	Monroeboy22@aol.com	eBay	\$2,050.00	KD
2	10/18/2000	Monroeboy22@aol.com	eBay	\$560.00	AC
3	10/18/2000	Monroeboy22@aol.com	eBay	\$450.00	MA
4	10/18/2000	Monroeboy22@aol.com	eBay	\$455.00	MH
5	10/18/2000	Monroeboy22@aol.com	eBay	\$455.00	JS
6	10/18/2000	Monroeboy22@aol.com	eBay	\$430.00	TV
7	11/14/2000	athensboy1978@yahoo.com	eBay	\$850.00	DH
8	11/25/2000	seattle1987@aol.com	eBay	\$2,600.00	TF
9	11/25/2000	seattle1987@aol.com	eBay	\$1,175.00	VG
10	11/26/2000	seattle1987@aol.com	eBay	\$1,325.00	PS
11	11/26/2000	seattle1987@aol.com	eBay	\$1,525.00	MM
12	11/27/2000	seattle1987@aol.com	eBay	\$2,300.00	DD
13	11/27/2000	seattle1987@aol.com	eBay	\$2,450.00	RH
14	11/28/2000	seattle1987@aol.com	eBay	\$1,125.00	TB
15	11/28/2000	seattle1987@aol.com	eBay	\$1,225.00	TB
16	11/28/2000	seattle1987@aol.com	eBay	\$2,640.00	JF
17	12/1/2000	seattle1987@aol.com	eBay	\$1,345.00	SP
18	12/4/2000	seattle1987@aol.com	eBay	\$1,330.00	HG
19	04/03/2001	evangelossoukas@hotmail.com	Dellauction	\$2,312.00	SG
20	5/15/2001	rochal23456@aol.com	eBay/ private sale	\$2,500.00	RW

Total Actual Loss: \$178,894.52

### 3. Attempted Losses Caused by Fraudulent Internet Auctions

32. On or about the dates listed below, EVANGELOS DIMITRIOS SOUKAS, using the user names/e-mail addresses set forth below, posted, or caused to be posted, false and fraudulent advertisements for merchandise on internet auction web sites seeking the prices/attempted losses as described below, which false and fraudulent advertisements did not result in actual losses because bidders suspected fraud or there were no bidders:

<u>Approximate Date</u>	<u>SOUKAS's User Name/ E-Mail</u>	<u>Auctioneer</u>	<u>Attempted Loss/ Price</u>
8/12/1999	soukas	eBay	\$410.00
10/2/2000	seattleboy1978	eBay	\$3,500.00
10/16/2000	Monroeboy22@aol.com	eBay	\$2,126.00
10/16/2000	Monroeboy22@aol.com	eBay	\$2,126.00

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

10/5/2000	dallaspilot1945@aol.com	eBay	\$510.00
2/26/1999	versgreek	eBay	\$3,980.00
4/21/2000	aapilot1045	eBay	\$3,550.00
4/13/2000	aapilot1045	eBay	\$2,800.00
6/3/1999	fratboy246@aol.com	eBay	\$1.00
5/11/2000	burke9999	eBay	\$3,200.00
5/11/2000	burke9999	eBay	\$3,153.00
5/6/2000	aapilot1045	eBay	\$3,050.00
5/6/2000	aapilot1045	eBay	\$3,150.00
5/11/2000	burke9999	eBay	\$3,000.00
8/8/2000	joshkpatz@hotmail.com	eBay	\$530.00
8/8/2000	joshkpatz@hotmail.com	eBay	\$2,677.27
8/8/2000	joshkpatz@hotmail.com	eBay	\$501.00
8/8/2000	joshkpatz@hotmail.com	eBay	\$501.00
8/8/2000	joshkpatz@hotmail.com	eBay	\$501.00
10/4/2000	newyorkpilot1945@aol.com	eBay	\$600.00
6/3/1999	fratboy246@aol.com	eBay	\$1.00
1/26/2000	kissboy99	eBay	\$2,551.99
5/11/2000	burke9999	eBay	\$3,350.00
8/8/2000	joshkpatz@hotmail.com	eBay	\$510.00
11/29/2000	seattle1987@aol.com	eBay	\$2,645.00
8/2/2000	joshkpatz@hotmail.com	eBay	\$2,425.00
8/8/2000	joshkpatz@hotmail.com	eBay	\$2,750.00
4/20/1999	gogoboy21@aol.com	eBay	\$500.00
10/4/2000	newyorkpilot1945@aol.com	eBay	\$570.00
4/6/2001	dieselboy1978	eBay	\$2,100.00
4/6/2001	dieselboy1978	eBay	\$2,100.00
4/6/2001	dieselboy1978	eBay	\$2,100.00
4/6/2001	dieselboy1978	eBay	\$2,100.00
4/6/2001	dieselboy1978	eBay	\$2,100.00
4/6/2001	dieselboy1978	eBay	\$2,550.00
4/6/2001	dieselboy1978	eBay	\$2,000.00
4/6/2001	dieselboy1978	eBay	\$2,000.00
4/6/2001	dieselboy1978	eBay	\$2,000.00
4/6/2001	dieselboy1978	eBay	\$2,000.00
4/6/2001	dieselboy1978	eBay	\$1,600.00
4/6/2001	dieselboy1978	eBay	\$1,600.00
4/6/2001	dieselboy1978	eBay	\$1,600.00
4/6/2001	dieselboy1978	eBay	\$1,600.00
4/6/2001	dieselboy1978	eBay	\$1,600.00

1	4/6/2001	dieselboy1978	eBay	\$1,600.00
2	4/6/2001	dieselboy1978	eBay	\$1,600.00
3	4/6/2001	dieselboy1978	eBay	\$1,600.00
4	4/6/2001	dieselboy1978	eBay	\$1,600.00
5	4/6/2001	dieselboy1978	eBay	\$1,600.00
6	4/6/2001	dieselboy1978	eBay	\$1,600.00
7	4/6/2001	dieselboy1978	eBay	\$1,600.00
8	4/6/2001	dieselboy1978	eBay	\$1,879.00
9	4/6/2001	dieselboy1978	eBay	\$1,879.00
10	4/6/2001	dieselboy1978	eBay	\$1,879.00
11	4/6/2001	dieselboy1978	eBay	\$1,879.00
12	4/6/2001	dieselboy1978	eBay	\$1,879.00
13	4/6/2001	dieselboy1978	eBay	\$1,879.00
14	4/6/2001	dieselboy1978	eBay	\$1,879.00
15	4/6/2001	dieselboy1978	eBay	\$1,635.00
16	4/6/2001	dieselboy1978	eBay	\$1,635.00
17	4/6/2001	dieselboy1978	eBay	\$1,635.00
18	4/6/2001	dieselboy1978	eBay	\$1,635.00

**Total Attempted Loss: \$114,833.26**

**E. Overt Acts**

33. In furtherance of the conspiracy, and to promote the objects thereof, EVANGELOS DIMITRIOS SOUKAS, and other coconspirators known and unknown to the Grand Jury, committed and caused to be committed, among others, the following overt acts in the Western District of Washington and elsewhere:

a. On or about June 14, 2000, BG mailed four postal money orders totaling \$2,500.00 to EVANGELOS SOUKAS at 18463 Blueberry Lane #J301, Monroe, Washington 98272.

b. On or about October 20, 2000, KD mailed Chevy Chase Bank cashiers check # 3128464 payable in the amount of \$2,050.00 to EVANGELOS SOUKAS at 18463 Blueberry Lane #J301, Monroc, Washington 98272.

c. On or about October 17, 2000, CF mailed a check drawn on CF's AA Credit Union account payable in the amount of \$2,151.00 to EVANGELOS SOUKAS at 18463 Blueberry Lane #J301, Monroc, Washington 98272.

1 d. On or about November 27, 2000, PS mailed a check drawn on PS's  
2 Bank of America account payable in the amount of \$1,325.00 to EVANGELOS  
3 SOUKAS at 18463 Blueberry Lane #J301, Monroe, Washington 98272.

4 e. On or about April 4, 2001, SG mailed a check drawn on SG's  
5 Credit Union of Denver account payable in the amount of \$2,132.00 to EVANGELOS  
6 SOUKAS at 18463 Blueberry Lane #J301, Monroe, Washington 98272.

7 f. On or about August 9, 2000, RM deposited \$2,625.00 into the  
8 Paypal account of EVANGELOS DIMITRIOS SOUKAS, account number  
9 \*\*\*\*\*9496, which SOUKAS opened using the false name "Josh Patz."

10 g. On or about August 12, 2000, AM deposited \$475.00 into the  
11 Paypal account of EVANGELOS DIMITRIOS SOUKAS, account number  
12 \*\*\*\*\*9496, which SOUKAS opened using the false name "Josh Patz."

13 h. On or about September 22, 2000, BV deposited \$1,035.00 into the  
14 Paypal account of EVANGELOS DIMITRIOS SOUKAS, account number  
15 \*\*\*\*\*8806, which SOUKAS opened using the false name "Josh Pats."

16 i. On or about September 25, 2000, LG deposited \$2,401.00 into the  
17 Paypal account of EVANGELOS DIMITRIOS SOUKAS, account number  
18 \*\*\*\*\*8806, which SOUKAS opened using the false name "Josh Pats."

19 j. On or about November 27, 2000, RH deposited \$2,450.00 into the  
20 Paypal account of EVANGELOS DIMITRIOS SOUKAS, account number  
21 \*\*\*\*\*4977, which SOUKAS opened using the false name "Josh Petz."

22 k. On or about May 17, 2001, RW wire transferred \$2,516.00 into a  
23 coconspirator's U.S. Bank account, account number \*-\*\*\*-\*\*\*\*5479.

24 All in violation of Title 18, United States Code, Section 371.

25 **COUNTS 2-6**  
26 **(Mail Fraud)**

27 1. The Grand Jury realleges and incorporates as if fully set forth herein  
28 paragraphs 1a and 2 through 33 of Count 1 of this Indictment.

1 **A. The Scheme and Artifice to Defraud**

2 2. Beginning at a date uncertain, but sometime in or about February 1999,  
3 and continuing through in or about May 2001, within the Western District of  
4 Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN  
5 SOUKAS, a/k/a JOSHUA PATZ, together with others both known and unknown to the  
6 Grand Jury, knowingly and willfully devised and intended to devise a scheme and  
7 artifice to defraud purchasers of merchandise on various internet auction web sites, and  
8 to obtain money and property of value from such purchasers by means of false and  
9 fraudulent pretenses, representations and promises, as more particularly set forth in  
10 Count 1 of this Indictment.

11 **B. Execution of the Scheme and Artifice**

12 3. On or about the following dates, within the Western District of  
13 Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, together with  
14 others both known and unknown to the Grand Jury, for the purpose of executing such  
15 scheme and artifice and attempting to do so, did knowingly and willfully send and  
16 deliver, and cause to be sent and delivered, by the mail and other private and  
17 commercial interstate carriers, according to the directions thereon, the items described  
18 below, each mailing constituting a representative example of the use of the mails in  
19 furtherance of the scheme and artifice to defraud, and each mailing constituting a  
20 separate count of this Indictment:

21

<u>Count</u>	<u>Approximate Date of Mailing</u>	<u>Monetary Instrument Mailed</u>	<u>Item Fraudulently Advertised by SOUKAS</u>	<u>Recipient</u>
2	06/14/2000	4 Postal Money Orders totaling \$2,500.00, mailed by BG	Sony VAIO Computer	Evangelos Soukas, 18463 Blueberry Lane #J301, Monroe, Washington 98272

22  
23  
24  
25  
26  
27  
28

3	10/20/2000	Chevy Chase Bank cashiers check #3128464 in the amount of \$2,050.00, mailed by KD	Sony VAIO Computer	Evangelos Soukas, 18463 Blueberry Lane #J-301, Monroe, Washington 98272
4	10/17/2000	Check drawn on CF's AA Credit Union account in the amount of \$2,151.00, mailed by CF	Sony VAIO Computer	Evangelos Soukas, 18463 Blueberry Lane #J-301, Monroe, Washington 98272
5	11/27/2000	Check drawn on PS's Bank of America account in the amount of \$1,325.00, mailed by PS	Toshiba Computer	Evangelos Soukas, 18463 Blueberry Lane #J301, Monroe, Washington 98272
6	04/04/2001	Check drawn on SG's Credit Union of Denver account in the amount of \$2,132.00, mailed by SG	Dell Inspiron Computer	Evangelos Soukas, 18463 Blueberry Lane #J301, Monroe, Washington 98272

All in violation of Title 18, United States Code, Sections 1341 and 2.

**COUNTS 7-12**  
**(Wire Fraud)**

1. The Grand Jury realleges and incorporates as if fully set forth herein paragraphs 1b and 2 through 33 of Count 1 of this Indictment.

**A. The Scheme and Artifice to Defraud**

2. Beginning at a date uncertain, but sometime in or about February 1999, and continuing through in or about May 2001, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOUS SOUKAS, a/k/a EVAN SOUKAS, a/k/a JOSHUA PATZ, together with others both known and unknown to the Grand Jury, knowingly and willfully devised and intended to devise a scheme and artifice to defraud purchasers of merchandise on various internet auction web sites, and to obtain money and property of value from such purchasers by means of false and



1 fraudulent pretenses, representations and promises, as more particularly set forth in  
2 Count 1 of this Indictment.

3 **B. Execution of the Scheme and Artifice**

4 2. On or about the following dates, within the Western District of  
5 Washington and elsewhere, EVANGELOS DIMITRIOUS SOUKAS, a/k/a EVAN  
6 SOUKAS, a/k/a JOSHUA PATZ, together with others known and unknown to the  
7 Grand Jury, for the purpose of executing such scheme or artifice, did knowingly and  
8 willfully transmit and cause to be transmitted, by wire communication in interstate and  
9 foreign commerce, the writings, signs, signals, pictures and sounds described below,  
10 each of which constitutes a representative example of the use of wire communications  
11 in furtherance of the scheme and artifice to defraud, and each transmission constituting  
12 a separate count of this Indictment:

13

<u>Count</u>	<u>Approximate Date of Wire</u>	<u>Transaction Detail</u>	<u>Item Fraudulently Advertised by SOUKAS</u>
14 7	08/09/2000	\$2,625.00 deposit by RM into SOUKAS's Paypal account # *****9496, which SOUKAS opened using the false name "Josh Patz"	Sony VAIO Computer
15 8	08/12/2000	\$475.00 deposit by AM into SOUKAS's Paypal account # *****9496, which SOUKAS opened using the false name "Josh Patz"	Nokia 8890 Cell Phone
16 9	09/22/2000	\$1,035.00 deposit by BV into SOUKAS's Paypal account # *****8806, which SOUKAS opened using the false name "Josh Pats"	Canon Camcorder
17 10	09/25/2000	\$2,401.00 deposit by LG into SOUKAS's Paypal account # *****8806, which SOUKAS opened using the false name "Josh Pats"	Sony XG19 Computer

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

11	11/27/2000	\$2,450.00 deposit by RH into SOUKAS's Paypal account # *****4977, which SOUKAS opened using the name "Josh Petz"	Sony F690 Computer
12	05/17/2001	\$2,516.00 transfer by RW to a coconspirator's U.S. Bank account, # *_**_*5479	PowerBook G4

All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT 13**  
**(Conspiracy to Commit Fraud Through Use  
of Other Persons' Means of Identification)**

**A. The Offense**

1. Beginning at a date uncertain, but sometime in or about July 2000, and continuing through in on or about February 2004, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN SOUKAS, a/k/a JOSHUA PATZ, and others known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate and agree to knowingly use, without lawful authority, the means of identification of other persons, and thereby obtain something of value aggregating \$1,000.00 or more during a one-year period, with the intent to commit, and to aid and abet, unlawful activity that constitutes violations of federal law, to wit, Mail Fraud, in violation of Title 18, United States Code, Section 1341, Wire Fraud, in violation of Title 18, United States Code, Section 1343, Bank Fraud, in violation of Title 18, United States Code, Section 1344, and False Claims to the Internal Revenue Service, in violation of Title 18, United States Code, Section 287.

**B. The Object of the Conspiracy**

2. It was the object of the conspiracy for EVANGELOS DIMITRIOS SOUKAS and other coconspirators to fraudulently obtain cash, funds, merchandise and credits by using the means of identification of other individuals, to wit, victims' names, Social Security Numbers and dates of birth, without lawful authority, to apply for lines of credit and loans by way of the internet; to fraudulently purchase merchandise and to

1 cause such merchandise to be shipped in interstate commerce to 18463 Blueberry Lane,  
2 J-301, Monroe, Washington; to open bank accounts through the internet; to file false,  
3 fictitious and fraudulent United States Income Tax Returns in victims' names for the  
4 purpose of obtaining income tax refunds and tax refund anticipation loans; and to access  
5 victims' existing bank and investment accounts to transfer funds and obtain checks and  
6 access devices, and thereby obtain something of value aggregating \$1,000.00 or more  
7 during a one-year period.

8 **C. Manner and Means of the Conspiracy**

9 3. It was part of the conspiracy that EVANGELOS DIMITRIOS SOUKAS  
10 would steal and otherwise obtain without permission the means of identification of  
11 others, to wit, victims' names, Social Security Numbers and dates of birth.

12 4. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
13 SOUKAS would use the victims' means of identification, without lawful authority, to  
14 apply for and obtain lines of credit, credit cards, bank accounts and home equity loans,  
15 all by way of the internet.

16 5. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
17 SOUKAS would use the victims' means of identification and credit that he fraudulently  
18 obtained to purchase merchandise from on-line vendors, including Dell Computer and  
19 Target Corporation.

20 6. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
21 SOUKAS would cause merchandise that he fraudulently purchased using the credit and  
22 the means of identification of others to be shipped and delivered to coconspirators at  
23 18463 Blueberry Lane, Apartment J-301, Monroe, Washington.

24 7. It was further part of the conspiracy that coconspirators would accept and  
25 sign for merchandise that EVANGELOS DIMITRIOS SOUKAS had fraudulently  
26 purchased and caused to be delivered to 18463 Blueberry Lane, Apartment J-301,  
27 Monroe, Washington. When this merchandise was delivered to this residence,  
28 coconspirators would sign to accept delivery of the merchandise and would sometimes

1 sign the last name of the victim in whose name SOUKAS had purchased the  
2 merchandise.

3 8. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
4 SOUKAS would use and attempt to use victims' means of identification without lawful  
5 authority to apply for and obtain home equity loans and have said funds wire transferred  
6 to his own bank accounts and those of coconspirators.

7 9. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
8 SOUKAS would use the victims' means of identification, without their knowledge or  
9 permission, to file false, fictitious and fraudulent United States Income Tax returns in  
10 the victims' names for the purpose of obtaining income tax refunds and tax refund  
11 anticipation loans. After obtaining these refunds, SOUKAS would have the funds wire  
12 transferred to his or his coconspirators' bank accounts. The coconspirators would wire  
13 transfer these funds to foreign bank accounts held by SOUKAS, including a Eurobank  
14 account, account number \*\*\*.\*\*\*.\*\*\*\*\*0145.

15 10. It was further part of the conspiracy that EVANGELOS DIMITRIOS  
16 SOUKAS would use the victims' means of identification, without their knowledge or  
17 permission, to access victims' existing bank and investment accounts and then wire  
18 transfer funds to his own bank accounts, and to those of coconspirators, and to obtain  
19 checks and access devices, which he used for his own benefit and purposes.

20 **D. Overt Acts of the Conspiracy**

21 11. In furtherance of the conspiracy, and to promote the objects thereof,  
22 EVANGELOS DIMITRIOS SOUKAS, and other coconspirators known and unknown  
23 to the Grand Jury, committed and caused to be committed, among others, the following  
24 overt acts in the Western District of Washington and elsewhere:

25 a. On or about the following dates, EVANGELOS DIMITRIOS  
26 SOUKAS knowingly used and caused to be used, without lawful authority, the name,  
27 Social Security Number and date of birth of Joshua Patz, a real person, to fraudulently  
28 open the following bank accounts:

<u>Approximate Date</u>	<u>Manner Used by SOUKAS</u>	<u>Loss Amount</u>
07/18/2000	To open an account at G & L Bank, account # *****5515	\$750.00
09/15/2000	To open an account at Wingspan Bank, account # *****5494	Not available
10/16/2000	To open an account at Bank One, account # *****4792	\$206.97

b. On or about the following dates, EVANGELOS DIMITRIOS SOUKAS knowingly used and caused to be used, without lawful authority, the following victims' means of identification, to wit, their names, Social Security Numbers and dates of birth, to apply for and obtain lines of credit with Dell Finance Corporation, a subsidiary of Dell Computers, via the internet, and to purchase the following computer equipment and accessories that were shipped per SOUKAS's instructions via United Parcel Service (UPS) to coconspirators at 18463 Blueberry Lane, Apartment J-301, Monroe, Washington, resulting in an actual loss to Dell Computers of approximately \$18,580.95:

<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Transaction</u>	<u>Loss Amount</u>
04/06/2001	Joshua Patz	Purchase of a Dell I8000 computer and other equipment	\$4,993.75
04/10/2001	EH	Purchase of a Dell I3800 computer and other equipment	\$4,781.85
04/18/2001	AG	Purchase of a Dell I4000 computer and other equipment	\$4,879.35
04/28/2001	JA	Purchase of a Dell I4000 computer and other equipment	\$3,926.00

c. On or about the following dates, EVANGELOS DIMITRIOS SOUKAS knowingly used and caused to be used, without lawful authority, the following victims' means of identification, to wit, their names, Social Security Numbers

1 and dates of birth, to apply for and obtain lines of credit with Dell Finance Corporation,  
2 a subsidiary of Dell Computers, via the internet, and to order the following computer  
3 equipment and accessories, with instructions to ship said merchandise via UPS to  
4 coconspirators at 18463 Blueberry Lane, Apartment J-301, Monroe, Washington,  
5 resulting in an attempted loss to Dell Computers of approximately \$12,477.30:

<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Transaction</u>	<u>Attempted Loss Amount</u>
03/05/2001	Joshua Patz	Purchase of a Mavica MVC- CD1000 and other equipment	\$1,199.95
03/28/2001	Joshua Patz	Purchase of a digital camcorder kit	\$1,228.35
04/13/2001	RL	Purchase of a Dell 18000 Pentium III computer and other equipment	\$4,426.00
04/20/2001	KR	Purchase of a Dell 14000 computer and other equipment	\$3,645.00
04/27/2001	LA	Purchase of a Dell 14000 computer and other equipment	\$1,978.00

16 d. On or about the following dates, EVANGELOS DIMITRIOS  
17 SOUKAS knowingly used and caused to be used, without lawful authority, the  
18 following victims' means of identification, to wit, their names, Social Security Numbers  
19 and dates of birth, to apply for and obtain lines of credit with Target Corporation via the  
20 internet, and to purchase the following merchandise and gift cards that were shipped per  
21 SOUKAS's instructions via interstate common carrier to coconspirators at 18463  
22 Blueberry Lane, Apartment J-301, Monroe, Washington, resulting in an actual loss to  
23 Target Corporation totaling approximately \$5,600.00:

24  
25 //

26  
27 //

<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Transaction</u>	<u>Actual Loss Amount</u>
04/05/2001	Joshua Patz	Purchase of diamond earrings	\$194.93
04/11/2001	EH	Purchase of ten Target gift cards	\$950.00
04/17/2001	AG	Purchase of seven Target gift cards	\$700.00
04/17/2001	RL	Purchase of one Target gift card	\$1,000.00
04/26/2001	NT	Purchase of a camera, a ring and four Target gift cards	\$949.03
05/03/2001	KH	Purchase of a camera	\$562.93
05/07/2001	JG	Purchase of merchandise	\$270.94
05/07/2001	SE	Purchase of merchandise	\$972.78

e. On or about May 10, 2001, a coconspirator accepted six packages delivered via an interstate common carrier to the residence at 18463 Blueberry Lane, Apartment J-301, Monroe, Washington. The packages were addressed to persons whose means of identification had been unlawfully used by EVANGELOS DIMITRIOS SOUKAS to order the packages. Pursuant to SOUKAS's instructions, the coconspirator, who knew these individuals did not reside at 18463 Blueberry Lane, signed to accept delivery of the packages using the false name, "Melissa Anderson."

f. On or about the below-listed dates, EVANGELOS DIMITRIOS SOUKAS knowingly used and caused to be used, without lawful authority, the following victims' means of identification, to wit, their names, Social Security Numbers and dates of birth, to file false, fictitious and fraudulent United States Income Tax Returns via the internet and fraudulently apply for income tax refund anticipation loans via the internet with the banks indicated below, with any refunds or loan proceeds to be deposited into bank accounts controlled by SOUKAS or his coconspirators:

//

<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Manner Used</u>	<u>Amount of Refund Claimed by SOUKAS</u>
02/13/2001	Joshua Patz	To file false 2000 U.S. Income Tax Return	\$3,877.00
04/15/2002	Joshua Patz	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Pacific Capital Bank	\$4,427.00
04/15/2002	RB	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Pacific Capital Bank	\$4,377.00
04/15/2002	AG	To file false 2001 U.S. Income Tax Return	\$4,377.00
04/15/2002	SH	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Republic Bank and Trust	\$2,377.00
04/15/2002	KH	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Republic Bank and Trust	\$4,294.00
04/15/2002	JP	To file false 2001 U.S. Income Tax Return	\$4,651.00

g. On or about March 30, 2001, a coconspirator accepted a wire transfer of \$3,877.00 into her U.S. Bank checking account, account number \*-\*\*\*-\*\*\*\*5479, sent by the United States Treasury Department in response to the fraudulent 2000 United States Income Tax return that EVANGELOS DIMITRIOS SOUKAS had fraudulently filed using Joshua Patz's name.

h. On or about March 30, 2001, a coconspirator caused \$3,600.00 to be wire transferred from her U.S. Bank checking account, account number \*-\*\*\*-\*\*\*\*5479, to EVANGELOS DIMITRIOS SOUKAS's Eurobank account, account number \*\*\*-\*\*\*-\*\*\*\*\*0145.



i. On or about the following dates, EVANGELOS DIMITRIOS SOUKAS knowingly used and caused to be used, without lawful authority, the following victims' means of identification, to wit, their names, Social Security Numbers and dates of birth, to fraudulently apply for home equity loans with Deep Green Bank, by applying via the internet for said loans and directing that loan proceeds be transferred to SOUKAS's or his coconspirators' bank accounts, thereby causing the following actual and attempted losses to Deep Green Bank:

<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Size of Loan For Which SOUKAS Applied</u>
05/21/2001	SE	\$25,000.00 (attempt)
05/25/2001	KR	\$25,000.00 (actual)
05/26/2001	EH	\$25,000.00 (actual)
05/28/2001	NT	\$25,000.00 (attempt)
05/25/2001	JA	\$20,000.00 (attempt)
05/30/2001	BP	\$20,000.00 (attempt)
05/28/2001	GB	\$20,000.00 (attempt)
06/1/2001	RL	\$20,000.00 (attempt)
06/15/2001	KH	\$25,000.00 (attempt)
06/01/2001	GA	\$20,000.00 (attempt)
06/01/2001	LA	\$25,000.00 (attempt)
04/2002	LS	\$25,000.00 (attempt)

j. On or about May 21, 2001, a coconspirator accepted a wire transfer of \$25,000.00 into her U.S. Bank checking account, account number \*-\*\*\*-\*\*\*\*5479, sent by Deep Green Bank in response to the fraudulent home equity loan obtained by EVANGELOS DIMITRIOS SOUKAS in the name of SE. Once the funds were put into the coconspirator's account, Deep Green Bank discovered the fraud and reversed the wire transfer, thereby removing said funds from the coconspirator's account.

1 k. On or about December 5, 2003, EVANGELOS DIMITRIOS  
2 SOUKAS knowingly used and caused to be used, without lawful authority, the name,  
3 Social Security Number and date of birth of NG, a real person, to access NG's Fidelity  
4 Investment account and attempt to transfer approximately \$285,000.00 from this  
5 account into SOUKAS's Eurobank account, account number \*\*\*-\*\*\*-\*\*\*\*\*0145.

6 l. On or about December 18, 2003, EVANGELOS DIMITRIOS  
7 SOUKAS knowingly used and caused to be used, without lawful authority, the name,  
8 Social Security Number and date of birth of NG, a real person, to access NG's account  
9 at Wachovia Bank, have blank checks on this account sent to SOUKAS in Greece, and  
10 negotiate a check drawn on this account, which SOUKAS had made payable to himself  
11 in the amount of \$8,000.00, at a bank in Athens, Greece.

12 m. On or about February 10, 2004, EVANGELOS DIMITRIOS  
13 SOUKAS knowingly used and caused to be used, without lawful authority, the name,  
14 Social Security Number and date of birth of NG, a real person, to apply at Wachovia  
15 Mortgage Co. for a home equity loan in the amount of \$50,000.00 on a home owned by  
16 NG and his wife.

17 n. Beginning on or about October 3, 2003, and continuing through in  
18 or about February 2004, EVANGELOS DIMITRIOS SOUKAS knowingly used and  
19 caused to be used, without lawful authority, the name, Social Security Number and date  
20 of birth of JEP, a real person, to place fraudulent charges on JEP's Visa, American  
21 Express and Citibank accounts; to obtain cash advances in the approximate amount of  
22 \$5,000.00; to obtain approximately \$700.00 from JEP's E-Trade account; to attempt to  
23 wire transfer approximately \$30,000.00 from JEP's E-Trade account to SOUKAS's  
24 account at Alpha Bank, account number \*\*\*\*-\*\*\*\*\*3002; and to attempt to obtain  
25 approximately \$10,000.00 from JEP's Wells Fargo business checking account.

26 o. On or about February 9, 2004, EVANGELOS DIMITRIOS  
27 SOUKAS knowingly used and caused to be used, without lawful authority, the name,  
28 Social Security Number and date of birth of JEP, a real person, to forge and cash check

1 number 1002, drawn on the Wells Fargo account of JEP, account number \*\*\*\*\*3330,  
2 which SOUKAS made payable to himself in the amount of \$60,000.00 and negotiated at  
3 a bank in Athens, Greece.

4 p. On or about July 1, 2004, EVANGELOS DIMITRIOS SOUKAS  
5 knowingly used and caused to be used, without lawful authority, the name, Social  
6 Security Number and date of birth of JEP, a real person, to apply for a Bank of America  
7 credit card, account number \*\*\*.\*\*\*\*\*-\*\*\*\*-8533, which account had a credit line in  
8 the amount of \$11,500.00, and to apply for a Provident National Bank credit card,  
9 account number \*\*\*\*-\*\*\*\*-\*\*\*\*-0246, which account had a credit line in the amount  
10 of \$10,000.00.

11 All in violation of Title 18, United States Code, Sections 1028(f), 1028(a)(7) and  
12 1028(b)(1)(D).

13  
14 **COUNTS 14-18**  
**(Fraudulent Use of Another Person's Means of Identification)**

15 On or about the dates listed below, within the Western District of Washington  
16 and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN SOUKAS, a/k/a  
17 JOSHUA PATZ knowingly and without lawful authority used and caused to be used, in  
18 and affecting interstate commerce, the means of identification, to wit, the names, Social  
19 Security Numbers and dates of birth, of the following persons (identified by name or  
20 initials), with the intent to commit and aid and abet the commission of an unlawful  
21 activity that constituted a violation of federal law, specifically, Mail Fraud, in violation  
22 of Title 18, United States Code, Section 1341, by fraudulently using such means of  
23 identification to open lines of credit with companies including Dell Finance  
24 Corporation, a subsidiary of Dell Computers, and Target Corporation and to order  
25 merchandise and gift cards that were delivered by mail to coconspirators, and thereby  
26 obtained something of value aggregating \$1,000.00 or more during a one-year period:  
27  
28

<u>Count</u>	<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Transaction</u>	<u>Loss Amount</u>
14	04/06/2001	Joshua Patz	Purchase of a Dell I8000 computer and other equipment	\$4,993.75
15	04/10/2001	EH	Purchase of a Dell I3800 computer and other equipment	\$4,781.85
16	04/18/2001	AG	Purchase of a Dell I4000 computer and other equipment	\$4,879.35
17	02/28/2001	JA	Purchase of a Dell I4000 computer and other equipment	\$3,926.00
18	04/17/2001	RL	Purchase of a Target gift card	\$1,000.00

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D) and 2.

**COUNTS 19-30**  
**(Fraudulent Use of Another Person's Means of Identification)**

On or about the dates listed below, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN SOUKAS, a/k/a JOSHUA PATZ, knowingly and without lawful authority used and caused to be used, in and affecting interstate commerce, the means of identification, to wit, the names, Social Security Numbers and dates of birth, of the following persons (identified by name or initials), with the intent to commit and aid and abet the commission of an unlawful activity that constitutes a violation of federal law, specifically, Bank Fraud, in violation of Title 18, United States Code, Section 1344, by fraudulently using such means of identification to apply for home equity loans with Deep Green Bank, and thereby obtained and attempted to obtain something of value aggregating \$1,000.00 or more during a one-year period:

<u>Count</u>	<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Amount of Loan For Which SOUKAS Applied/ Loss Amount</u>
19	05/21/2001	SE	\$25,000.00 (attempt)
20	05/25/2001	KR	\$25,000.00 (actual loss)
21	05/26/2001	EH	\$25,000.00 (actual loss)
22	05/28/2001	NT	\$25,000.00 (attempt)
23	05/25/2001	JA	\$20,000.00 (attempt)
24	05/30/2001	BP	\$20,000.00 (attempt)
25	05/28/2001	GB	\$20,000.00 (attempt)
26	06/1/2001	RL	\$20,000.00 (attempt)
27	06/15/2001	KH	\$25,000.00 (attempt)
28	06/01/2001	GA	\$20,000.00 (attempt)
29	06/01/2001	LA	\$25,000.00 (attempt)
30	04/2002	LS	\$25,000.00 (attempt)

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D), 1028(f) and 2.

#### **COUNTS 31-37**

#### **(Fraudulent Use of Another Person's Means of Identification)**

On or about the dates listed below, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN SOUKAS, a/k/a JOSHUA PATZ, knowingly and without lawful authority used and caused to be used, in and affecting interstate commerce, the means of identification, to wit, the names, Social Security Numbers and dates of birth, of the following persons (identified by name or initials), with the intent to commit and aid and abet the commission of unlawful activity that constituted a violation of federal law, specifically, False Claims to the IRS, in violation of Title 18, United States Code, Section 287, by fraudulently using such means of identification to file false, fictitious and fraudulent United States Income Tax Returns and to apply for refund anticipation loans with the banks described below, and thereby

1 obtained and attempted to obtain something of value aggregating \$1,000.00 or more  
2 during a one-year period:

<u>Count</u>	<u>Approximate Date</u>	<u>Identity Used by SOUKAS</u>	<u>Manner Used</u>	<u>Amount of Refund Claimed by SOUKAS</u>
31	02/13/2001	Joshua Patz	To file false 2000 U.S. Income Tax Return	\$3,877.00 (actual loss)
32	04/15/2002	Joshua Patz	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Pacific Capital Bank	\$4,427.00
33	04/15/2002	RB	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Pacific Capital Bank	\$4,377.00
34	04/15/2002	AG	To file false 2001 U.S. Income Tax Return	\$4,377.00 (actual loss)
35	04/15/2002	SH	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Republic Bank and Trust	\$2,377.00 (actual loss)
36	04/15/2002	KH	To file false 2001 U.S. Income Tax Return and apply for refund anticipation loan through Republic Bank and Trust	\$4,294.00
37	04/15/2002	JP	To file false 2001 U.S. Income Tax Return	\$4,651.00

24 All in violation of Title 18, United States Code, Sections 1028(a)(7),  
25 1028(b)(1)(D), 1028(f) and 2.

27 //

**COUNTS 38**  
**(Fraudulent Use of Another Person's Means of Identification)**

On or about February 9, 2004, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN SOUKAS, a/k/a JOSHUA PATZ, knowingly and without lawful authority used and caused to be used, in and affecting interstate commerce, the means of identification, to wit, the name, Social Security Number and date of birth, of JEP, a real person, with the intent to commit and aid and abet the commission of unlawful activity that constituted a violation of federal law, specifically, Bank Fraud, in violation of Title 18, United States Code, Section 1344, by fraudulently using such means to obtain blank checks drawn on JEP's Wells Fargo Bank account, account number \*\*\*\*\*3330, which SOUKAS made payable to himself in the amount of \$60,000.00 and cashed, and thereby obtained something of value aggregating \$1,000.00 or more during a one-year period.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D), and 2.

**COUNT 39**  
**(Fraudulent Use of Another Person's Means of Identification)**

On or about January 16, 2004, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOS SOUKAS, a/k/a EVAN SOUKAS, a/k/a JOSHUA PATZ, knowingly and without lawful authority used and caused to be used, in and affecting interstate commerce, the means of identification, to wit, the name, Social Security Number and date of birth, of NG, a real person, with the intent to commit and aid and abet the commission of unlawful activity that constituted a violation of federal law, specifically, Bank Fraud, in violation of Title 18, United States Code, Section 1344, by fraudulently using such means to obtain blank checks drawn on NG's Wachovia Bank account, account number \*\*\*\*\*5343, which SOUKAS made payable to himself in the amount of \$8,000.00, and thereby obtained something of value aggregating \$1,000.00 or more during a one-year period.

1 All in violation of Title 18, United States Code, Sections 1028(a)(7),  
2 1028(b)(1)(D) and 2.

3 **COUNT 40**  
4 **(False Claims to IRS)**

5 On or about March 30, 2000, within the Western District of Washington and  
6 elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented,  
7 and caused to be made and presented to the United States Department of the Treasury  
8 through the Internal Revenue Service, a claim against the United States for payment,  
9 that is, a United States Income Tax Return for Tax Year 1999, which claimed a refund  
10 of federal income taxes in the amount of \$3,614.00, knowing the claim to be false,  
11 fictitious and fraudulent, in that in preparing and presenting said return, SOUKAS  
12 knowingly made false statements of income and falsely made it appear that SOUKAS  
13 had been employed by the Embassy Suites located in Lynnwood, Washington.

14 All in violation of Title 18, United States Code, Section 287.

15 **COUNT 41**  
16 **(False Claims to IRS)**

17 On or about January 29, 2001, within the Western District of Washington and  
18 elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented,  
19 and caused to be made and presented to the United States Department of the Treasury  
20 through the Internal Revenue Service, a claim against the United States for payment,  
21 that is, a United States Income Tax Return for Tax Year 2000, which claimed a refund  
22 of federal income taxes in the amount of \$30,975.00, knowing the claim to be false,  
23 fictitious and fraudulent, in that in preparing and presenting said tax return, SOUKAS  
24 knowingly made false statements of income and falsely made it appear that SOUKAS  
25 had been employed by the Embassy Suites located in Lynnwood, Washington.

26 All in violation of Title 18, United States Code, Section 287.

27  
28 //



1                                   **COUNT 42**  
2                                   **(False Claim to IRS)**

3           On or about February 13, 2001, within the Western District of Washington and  
4 elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented,  
5 and caused to be made and presented to the United States Department of the Treasury  
6 through the Internal Revenue Service, a claim against the United States for payment,  
7 that is, a United States Income Tax Return for Tax Year 2000, in the name of Joshua  
8 Patz, a real person, which claimed a refund of federal income taxes in the amount of  
9 \$3,877.00, knowing the claim to be false, fictitious and fraudulent, in that in preparing  
10 and presenting said tax return, SOUKAS knowingly made false statements of income,  
11 used the false name "Joshua Patz," used a false Social Security Number, used a false  
12 date of birth, falsely made it appear that Patz had worked at Embassy Suites in  
13 Lynnwood, Washington, and fraudulently presented this tax return to the Internal  
14 Revenue Service after having already filed a United States Income Tax Return for Tax  
15 Year 2000.

16           All in violation of Title 18, United States Code, Section 287.

17                                   **COUNT 43**  
18                                   **(False Claim to IRS)**

19           On or about April 15, 2002, within the Western District of Washington and  
20 elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented,  
21 and caused to be made and presented to the United States Department of the Treasury  
22 through the Internal Revenue Service, a claim against the United States for payment,  
23 that is, a United States Income Tax Return for Tax Year 2001, which claimed a refund  
24 of federal income taxes in the amount of \$4,667.00, knowing the claim to be false,  
25 fictitious and fraudulent, in that in preparing and presenting said tax return, SOUKAS  
26 knowingly made false statements of income.

27           All in violation of Title 18, United States Code, Section 287.

28   //



**COUNT 46**  
**(False Claim to IRS)**

On or about April 15, 2002, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented, and caused to be made and presented to the United States Department of the Treasury through the Internal Revenue Service, a claim against the United States for payment, that is, a United States Income Tax Return for Tax Year 2001, in the name of a real person, represented herein by the initials AG, which claimed a refund of federal income taxes in the amount of \$4,377.00, knowing the claim to be false, fictitious and fraudulent, in that in preparing and presenting said tax return, SOUKAS knowingly made false statements of income, used the false name AG, used a false Social Security Number, used a false date of birth and fraudulently presented this tax return to the Internal Revenue Service after having already filed a United States Income Tax Return for Tax Year 2001.

All in violation of Title 18, United States Code, Section 287.

**COUNT 47**  
**(False Claim to IRS)**

On or about April 15, 2002, within the Western District of Washington and elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented, and caused to be made and presented to the United States Department of the Treasury through the Internal Revenue Service, a claim against the United States for payment, that is, a United States Income Tax Return for Tax Year 2001, in the name of a real person, represented herein by the initials SH, which claimed a refund of federal income taxes in the amount of \$2,377.00, knowing the claim to be false, fictitious and fraudulent, in that in preparing and presenting said tax return, EVANGELOS DIMITRIOUS SOUKAS knowingly made false statements of income, used the false name SH, used a false Social Security Number, used a false date of birth and

//

1 fraudulently presented this tax return to the Internal Revenue Service after having  
2 already filed a United States Income Tax Return for Tax Year 2001.

3 All in violation of Title 18, United States Code, Section 287.

4 **COUNT 48**  
5 **(False Claim to IRS)**

6 On or about April 15, 2002, within the Western District of Washington and  
7 elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented,  
8 and caused to be made and presented to the United States Department of the Treasury  
9 through the Internal Revenue Service, a claim against the United States for payment,  
10 that is, a United States Income Tax Return for Tax Year 2001, in the name of a real  
11 person represented herein by the initials KH, which claimed a refund of federal income  
12 taxes in the amount of \$4,294.00, knowing the claim to be false, fictitious and  
13 fraudulent, in that in preparing and presenting said tax return, SOUKAS knowingly  
14 made false statements of income, used the false name KII, used a false Social Security  
15 Number, used a false date of birth and fraudulently presented this tax return to the  
16 Internal Revenue Service after having already filed a United States Income Tax Return  
17 for Tax Year 2001.

18 All in violation of Title 18, United States Code, Section 287.

19 **COUNT 49**  
20 **(False Claim to IRS)**

21 On or about April 15, 2002, within the Western District of Washington and  
22 elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented,  
23 and caused to be made and presented to the United States Department of the Treasury  
24 through the Internal Revenue Service, a claim against the United States for payment,  
25 that is, a United States Income Tax Return for Tax Year 2001, in the name of a real  
26 person, represented herein by the initials JP, which claimed a refund of federal income  
27 taxes in the amount of \$4,651.00, knowing the claim to be false, fictitious and  
28 fraudulent, in that in preparing and presenting said tax return, SOUKAS knowingly  
made false statements of income, used the false name JP, used a false Social Security

1 Number, used a false date of birth and fraudulently presented this tax return to the  
2 Internal Revenue Service after having already filed a United States Income Tax Return  
3 for Tax Year 2001.

4 All in violation of Title 18, United States Code, Section 287.

5 **COUNT 50**  
6 **(False Claim to IRS)**

7 Or about April 15, 2003, within the Western District of Washington and  
8 elsewhere, EVANGELOS DIMITRIOUS SOUKAS knowingly made and presented,  
9 and caused to be made and presented to the United States Department of the Treasury  
10 through the Internal Revenue Service, a claim against the United States for payment,  
11 that is, a United States Income Tax Return for Tax Year 2002, which claimed a refund  
12 of federal income taxes in the amount of \$4,345.00, knowing the claim to be false,  
13 fictitious and fraudulent, in that in preparing and presenting said tax return,  
14 EVANGELOS DIMITRIOUS SOUKAS knowingly made false statements of income.

15 All in violation of Title 18, United States Code, Section 287.

16  
17 A TRUE BILL:

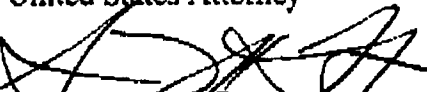
18 DATED:

2117105

19 *(Signature of Foreperson redacted pursuant to  
20 the policy of the judicial conference.)*

21 FOREPERSON

22   
23 JOHN MCKAY  
24 United States Attorney

25   
26 SUSAN M. HARRISON  
27 Assistant United States Attorney

28   
KARYN S. JOHNSON  
Assistant United States Attorney